

EXHIBIT D

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10 **ATTORNEYS FOR DEFENDANTS**

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DISTRICT**

14 **DAVID HOUGH, et al.**

15 *Plaintiffs,*

16 **v.**

17 **RYAN CARROLL, et al.**

18 *Defendants.*

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

TODD BRADLEY'S
AFFIDAVIT IN SUPPORT OF
DEFENDANTS' MOTION FOR A
PROTECTIVE ORDER

Hearing: 5/13/24, 1:30 p.m. PT

Action Filed: April 9, 2024

Trial Date: N/A

Trial Date: N/A

22
23 BEFORE ME, the undersigned authority, on this day personally appeared
24 **Todd Bradley**, and being duly sworn upon his oath by me, deposed and stated as
25 follows:
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27 1. "My name is **Todd Bradley**. I am over eighteen (18) years of age. I am of
28 sound mind and fully capable to make this Affidavit. The facts set forth herein are

1 based on my personal knowledge and are true and correct. I am competent to testify
2 to the facts herein.

3 2. “I am an owner of Defendant Houtex Farm Equity Partners, LLC (“**Houtex**”)
4 and the Farm Manager for Houtex.

5 3. “I am familiar with the matters in controversy in the litigation against Houtex
6 and others in the United States District Court for the Central District of California
7 (“**CDCA**”) (herein referred to as the “**Hough Litigation**”).

8 4. “I submit this affidavit in support of Defendants’ Motion for a Protective Order
9 to be filed in the CDCA in the Hough Litigation.

10 5. “On May 8, 2024 at 12:34 p.m., I received a call from “Banks Law Office”
11 shortly after I got home from work. When I answered, attorney Nico Banks (“**Mr.**
12 **Banks**”) asked if I was the owner of Houtex Cricket Farm. I replied that I was. Mr.
13 Banks proceeded to ask what kind of business we are, to which I replied we are a
14 cricket farm, as it states in the name.

15 6. Mr. Banks then began asking me if I was a new owner because he noticed that
16 on our Houtex website the contacts were changed to include my name. At this point,
17 I questioned him as to why he was calling me. Then, Mr. Banks stated for the first
18 time that he is involved in a court case with Max Kevin Day (“**Mr. Day**”) for money
19 laundering and that he believes Houtex Farm is also money laundering.

20 7. I told Mr. Banks that unfortunately I am not involved in this court case you are
21 speaking about, so I would not be commenting on any questions he had. After this,
22 Mr. Banks threatened me, stating that it would be in my best interest to give him
23 additional information or my bank accounts would be in jeopardy of being frozen as
24 well. I told him if he would like to do that, he was more than welcome to. Mr. Banks
25 once again threatened me, stating that it was in my best interest to give him
26 information. At this point, I told him that if he is involved in a court case with Mr.
27 Day, that he should have his contact information to ask him for further information
28 himself. After this, Mr. Banks continued harassing me, asking again if I would like
to share anything, to which I replied that unfortunately I do not have any information
for you. This is where we ended the call and I told him to have a good one.

8. The call occurred at 12:34 pm on May 8, 2024. The number I was called from
is “971-678-0036” with a Caller ID of “BANKS LAW OFFIC”. Attached hereto as
Exhibit 1 is a true and correct copy of a screenshot from my cell phone, which
shows the Caller ID information and the time and date of the call.

1 FURTHER AFFIANT SAYETH NOT.

2 Todd Bradley
3 TODD BRADLEY

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10 **CERTIFICATE OF SERVICE**

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12 I hereby certify that a true and correct copy of the foregoing document, and
13 any attachments, will be served to counsel of record, in accordance with the
14 governing rules of procedure regarding service in this court on this *May 10, 2024*,
via email as follows:

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16 /s/ William Shibley
17 William Shibley
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